

UniGroup, Inc.

United Van Lines, LLC
Mayflower Transit, LLC
UniGroup Worldwide, Inc.
Total Transportation Services, Inc.
Vanliner Group, Inc.
Pinnacle Group Associates, Inc.



October 22, 2001

Robert L. Stephenson, II MPH, Director
Division of Workplace Programs, CSAP
5600 Fishers Lane
Rockwall II, Suite 815
Rockville, MD 20857

Re: Proposed Mandatory Guidelines for Federal Workplace Drug Testing Programs

Dear Sir:

Enclosed are comments made on behalf of United Van Lines, LLC and Mayflower Transit, LLC with regard to the proposal of the Department of Health and Human Services relative to Mandatory Guidelines for Federal Workplace Drug Testing Programs.

Your consideration and review of these comments would be greatly appreciated.

Sincerely,

Patrick J. Larch
President
Transportation Services Group

/mlb 166811
Enclosure

**Comments On Behalf Of
United Van Lines, LLC And Mayflower Transit, LLC
To The Proposal Of The Department Of Health and Human Services
For Mandatory Guidelines For Federal Workplace Drug Testing
Programs**

UniGroup, Inc., which is headquartered in St. Louis, Missouri owns two of the nations largest household goods movers, United Van Lines, LLC ("United") and Mayflower Transit, LLC ("Mayflower"), as well as other subsidiaries providing goods and services to the professional mover. UniGroup is owned exclusively by active agents and senior management of United and Mayflower.

Mayflower and United are authorized by the United States Department of Transportation ("USDOT") to transport household goods as both a common carrier and as a contract carrier. In order to comply with the Federal Motor Carrier Safety Regulations, United and Mayflower maintain drug and alcohol testing programs for their qualified van operators. During any particular calendar year, both van lines test thousands of van operators. These testing programs are considered to be among the most vital safety programs administered by UniGroup on behalf of both van lines.

Based on UniGroup's experience with this drug testing program, UniGroup is fully aware of the opportunities for van operators to mask the true content of urine that is required to be submitted under such federal workplace testing programs. The programs require urine specimens to be submitted to detect the presence of illegal substances that may impair the van operator's ability to operate a vehicle or equipment safely. The consequences of having illegal substances detected in a van operator's urine result in suspension and potentially cancellation from our van line service such that there is incentive for such van operators who may have ingested prohibited substances to tamper with the specimens which they are required to supply. Examples of how van operators are able to tamper with their urine samples vary. A van operator may try to adulterate a specimen by adding a chemical substance to the urine in order to mask or destroy the evidence of a drug. Likewise, a van operator may attempt to dilute the urine sample with a substance designed to decrease the concentration of a suspected substance below that which is needed to declare the sample positive for an illegal drug. Finally, other van operators may simply substitute the required specimen with a sample which they believe to be drug free. In all these scenarios, the urine specimens would otherwise test positive for illegal substances, but instead test negative, thereby allowing a driver who should be removed from service with the van line to immediately return to duty. Subjecting all urine specimens to validity testing offers a measure of assurance that adulterated or diluted specimens will be identified accordingly. This approach would offer a greater chance that van operators who place members of the public and specifically other motorists' safety at risk by continuing to operate a commercial vehicle while in the possession of prohibited substances would be taken off of the highways.

Certain other proposals address chemical or other specific characteristics of a urine sample, such as the PH level, creatinine level and specific gravity, and propose to

adopt as standards those that are found by the Department of Health and Human Services in the review of existing scientific literature. UniGroup supports the adoption of these levels as generally accepted in the scientific community. Specific quality control criteria that are proposed, as well as the proposed expansion of a medical review officer's duties to encompass review of alteration, substitution, and invalid test results, are also supported as necessary to procedurally achieving the goal of having each urine sample tested for validity.

In summary, it is UniGroup's recommendation that the proposed revisions for Mandatory Guidelines for Federal Workplace Drug Testing Programs be adopted as submitted by the Department of Health and Human Services.